

## REMARKS

This Application has been carefully reviewed in light of the Office Action mailed January 24, 2006. At the time of the Office Action, Claims 1-20 were pending in this Application. Claims 1-20 were rejected. Claims 1-3 and 5-20 have been amended, and New Claims 21-22 have been added. Applicants respectfully request reconsideration and favorable action in this case.

### Rejections under 35 U.S.C. § 102

Claims 1-2, 4-8, 12-13, 15-17 and 19 were rejected by the Examiner under 35 U.S.C. §102(b) as being anticipated by U.S. Patent 6,510,411 issued to Lewis M. Norton et al. (“*Norton*”). Applicants respectfully submit that *Norton* does not teach all of the elements of the claims as amended, as discussed below.

### Independent Claim 2

*Norton* does not teach or suggest the combination of elements recited in amended independent Claim 2. For example, *Norton* does not teach or suggest “storing at least one HTU dialog module for each topic, such that the dialog module can be played as a voice message of HTU instructions to the caller, wherein HTU instructions include instructions about how to use a particular service or product.” (emphasis added). *Norton* fails to disclose storing or providing a caller with HTU (“how to use”) instructions. Nothing in *Norton* teaches or suggests providing a caller with instructions about how to use a particular service or product. The example system disclosed by *Norton* takes a diner meal order from a caller, which clearly cannot be equated with providing a caller with instructions about how to use a particular service or product.

As another example, *Norton* does not teach or suggest “wherein some topics have more two or more dialog modules to be played as a set, different topics having different numbers of dialog modules.” First, as discussed above, *Norton* fails to disclose instructions about how to use a particular service or product (HTU instructions). Second, *Norton* fails to

disclose topics having two or more dialog modules to be played as a set, much less that different topics have different numbers of dialog modules.

As yet another example, *Norton* does not teach or suggest “playing to the caller the HTU instructions in the at least one HTU dialog module stored for the selected topic, such that if the selected topic has two or more associated dialog module to be played as a set, the caller may request to have the HTU instructions in any selected HTU dialog module in the set repeated.” First, as discussed above, *Norton* fails to disclose HTU instructions. Second, *Norton* fails to disclose playing multiple dialog modules as a set, much less allowing a caller to request a particular dialog module in a set of dialog modules to be repeated. The Examiner alleges that column 10, lines 58-67 of *Norton* discloses allowing a caller to request to have a selected dialog module repeated. (See Office Action, page 4). This portion of *Norton* discloses allowing a caller to “ask the system to REPEAT what is just said.” However, *Norton* does not disclose allowing a caller to select a particular dialog module to repeat from multiple dialog modules to be played as a set.

For at least these reasons, Applicants submit that amended Claim 2 is allowable over *Norton*. Thus, Applicants respectfully request reconsideration and allowance of Claim 2, as well as Claims 3-12 that depend from Claim 2.

Independent Claim 1

*Norton* does not teach or suggest the combination of elements recited in amended independent Claim 1. For example, *Norton* does not teach or suggest “storing at least one HTU dialog module for each topic, such that the dialog module can be played as a voice message of HTU instructions to the caller, wherein HTU instructions include instructions about how to use a particular service or product.” (emphasis added). *Norton* fails to disclose storing or providing a caller with HTU (“how to use”) instructions. Nothing in *Norton* teaches or suggests providing a caller with instructions about how to use a particular service or product. The example system disclosed by *Norton* takes a diner meal order from a caller, which clearly cannot be equated with providing a caller with instructions about how to use a particular service or product.

As another example, *Norton* does not teach or suggest “wherein some topics have more two or more dialog modules to be played as a set, different topics having different numbers of dialog modules.” First, as discussed above, *Norton* fails to disclose instructions about how to use a particular service or product (HTU instructions). Second, *Norton* fails to disclose topics having two or more dialog modules to be played as a set, much less that different topics have different numbers of dialog modules.

Independent Claim 13

*Norton* does not teach or suggest the combination of elements recited in amended independent Claim 13. For example, *Norton* does not teach or suggest “Information modules for providing the caller with verbal HTU instructions associated with the selected topic, the HTU instructions including instructions for using a particular service or product.” (emphasis added). *Norton* fails to disclose storing or providing a caller with verbal HTU (“how to use”) instructions. Nothing in *Norton* teaches or suggests providing a caller with verbal instructions about how to use a particular service or product. The example system disclosed by *Norton* takes a diner meal order from a caller, which clearly cannot be equated with providing a caller with verbal instructions about how to use a particular service or product.

As another example, *Norton* does not teach or suggest “wherein at least one topic has more than one associated Information module, different topics having different numbers of Information modules.” First, as discussed above, *Norton* fails to disclose instructions about how to use a particular service or product (HTU instructions). Second, *Norton* fails to disclose topics having more than one Information module, much less that different topics have different numbers of Information modules.” *Norton* does not disclose anything that could be equated with such element(s).

Rejections under 35 U.S.C. §103

Claims 3, 10, and 20 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Norton* in view of U.S. Patent Publication 2002/0055351 issued to Nicholas J. Esley et al. Claims 9 and 18 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Norton* in view of U.S. Patent Publication 2001/0014146 issued to William J. Beyda et al.

Claims 11 and 14 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Norton* in view of U.S. Patent Publication 2001/0025309 issued to Christopher Clemmert et al.

Claims 3, 9, 10, and 11 are allowable at least because they depend from amended Claim 2, shown above to be allowable.

Claims 14, 18, and 20 are allowable at least because they depend from amended Claim 2, shown above to be allowable.

**New Claims 21-22**

New Claims 21-22 are allowable at least because they depend from amended Claims 2 and 13, shown above to be allowable. In addition, new Claims 21-22 include additional limitations not disclosed by the cited references. For example, Claim 21 recites: “prompting the caller to name or describe a service/product or to request a list of services/products; if the caller requests a list of services/products, providing a list of categories to the caller; identifying a response from the caller that corresponds to a particular category having more than one service/product; and disambiguating the identified response, wherein the disambiguating includes providing a list of services/products within the particular category and prompting the caller for a selection.” The cited references fail to teach or suggest such limitations.

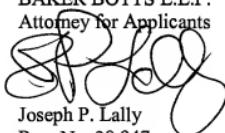
### CONCLUSION

Applicants have made an earnest effort to place this case in condition for allowance in light of the amendments and remarks set forth above. Applicants respectfully request reconsideration of Claims 1-22 as amended.

Applicants enclose a Petition for Two Month Extension of Time, and authorize the Commissioner to charge the \$450.00 extension fee to Deposit Account No. 50-2148 of Baker Botts L.L.P. Applicants also authorize the Commissioner to charge \$100.00 for two new dependent claims to Deposit Account No. 50-2148 of Baker Botts L.L.P. Applicants believe there are no additional fees due at this time; however, the Commissioner is hereby authorized to charge any fees necessary or credit any overpayment to Deposit Account No. 50-2148 of Baker Botts L.L.P.

If there are any matters concerning this Application that may be cleared up in a telephone conversation, please contact Applicants' attorney at 512.322.2680.

Respectfully submitted,  
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